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Attorney for Alireza MOHEB

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
vs.)
)
)
ALIREZA MOHEB,)
)
Defendant.)

NO.: CR 22-0132 JSW

SENTENCING MEMORANDUM
EXHIBIT
Second SUPPLEMENTAL

October 17, 2023
1:00 p.m.
Hon. Jeffrey S. WHITE

Alireza Moheb submits the following additional documents as Sentencing Memorandum exhibits for the Court's consideration.

1. Letter of Samira Nasseri.
2. Letter of Mohammad Mokarram.

DATED: October 16, 2023

-S- James P. Vaughns

JAMES PHILLIP VAUGHNS.
Attorney for Defendant MOHEB

EXHIBIT 1

Samira Nasser, J.D.
Walnut Creek, CA
Snasser100@gmail.com
(949)690-8853

Hon. Jeffrey S. White,

I am submitting this character witness letter on behalf of Alireza Moheb. I have known Ali since 1992; he was 16 years old at the time.

We met at Diablo Valley College, located in Pleasant Hill, California back in the early 90s. As an academically talented student, he was awarded academic acceleration at the age of 16. We instantly became good friends and a couple of years thereafter we entered into an 8-year romantic relationship, which unfortunately ended due to life's demands; Ali was just starting his dental career and I was finishing up grad school. Nevertheless, we always maintained a close friendship throughout the 30+ years.

I was very surprised and saddened to learn of the legal situation he is currently in, not only because of its obvious impact on Ali, but more so, because his actions were completely and utterly out of character for Ali, except for the fact that his motivation was to help someone in need. This is a person who will actually call and cancel a restaurant reservation rather than let the reservation lapse, simply because it's the right thing to do and so as to lessen the impact of not having done so.

Ever since I've known Ali, his enthusiasm, his love, and his passion for dentistry was palpable and constant. The mere thought of a potential disability really impacted Ali poorly and when he actually became disabled – he just wasn't himself anymore; not physically and definitely not mentally. He saw himself as incomplete and "broken." He didn't know what would become of him as a person, as a son whose parents doted on him proudly for the person he is and his accomplishments, as a professional, and as a member in good standing of the dental community. I am a witness to his dedication to his craft and all it encompasses.

Underneath Ali's "tough guy" exterior lies a gentle, sensitive and highly empathetic man. When I ran into a financial bind, Ali cut me a check for \$25,000 without even questioning when or if I can pay him back, (he wouldn't even accept a Promissory Note drafted by my attorneys). When my brother unexpectedly passed away in 2017, Ali was one of the first people that showed up. He was consistently there for me for the two weeks following my brother's passing, helping me with all the arrangements. He checked in on me for months at least once, if not twice a week. Ali is an extremely caring person, but unfortunately, in our Iranian culture, men are taught to be tough and to press through the pain. Any signs of frailty are deemed a weakness. I say this, because knowing Ali, he will not talk about or highlight all the loving and selfless things he has done. Ali regularly donates to the American Cancer Society and Mom's Against Poverty as well as other organizations to give back to society. Additionally, Ali performed free dentistry services, in collaboration with Teen Challenge in Oakland California. He has also performed numerous dental surgeries in Jamaica for patients in areas that have no access to dental care throughout his dental career.

My mom, my uncle and I have all been a patient of Ali's throughout the last 20+ years at one point or another. Ali has always conducted himself in the utmost professional manner when at work, in my presence.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Samira Nasser', with a stylized flourish at the end.

Samira Nasser

EXHIBIT 2

Law Office of Mo Mokarram

1101 Fulton Avenue, Suite 1A

Sacramento, CA 95825

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May 9, 2023

To whom it may concern,

My name is Mohammad (AKA "Mo") Mokarram. My wife and I have two children and live in Carmichael, California. I am a bankruptcy attorney and have my own practice here in the Sacramento area. This letter is my opinion to describe what I believe regarding Ali Reza Moheb's character. It should be noted that these are my beliefs as a friend of Ali and not as his lawyer or legal representative, given that I am a licensed attorney.

I have known Ali Reza Moheb for the past 30 years. Ali Moheb and I met at Diablo Valley College when I was 18 years age and we have maintained our friendship since then. We both transferred to University of California, at Davis to further our academic degrees. Ali eventually went to Dental School in Florida, where I visited him on multiple occasions in Florida. I have witnessed his success personally and the kindness he displays day in and day out for his family, friends, and those in need.

In my humble opinion, Ali Moheb is a man a great character and true friend. Ali has always been there for me the past 30 years of friendship and truly cares about all his friendships. Ali is a diligent, hard working person, striving to be the best he can be. Ali is close to his family and has deep ties with his parents and his sister. I have know his family the past 30 years and I believe the Moheb family to be kind and hardworking family.

I am particularly excited about the new chapter of Ali's life, where he will be working with the non-profit dear to his heart, merging his passion for dentistry and underrepresented youths in need of dental care. I personally believe this endeavor will make Ali a more giving and understanding person, showing his altruistic passions in life.

Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mohammad Mokarram', with a long horizontal flourish extending to the right.

Mohammad Mokarram